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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal No. 22-mj-56-ABJ

CHRISTOPHER CHARLES BAKER,

Defendant.

UNOPPOSED MOTION TO TOLL SPEEDY TRIAL CALCULATION

The Defendant, Christopher Charles Baker, by and through his attorney, David Weiss, Assistant Federal Public Defender, hereby requests a tolling of grand jury presentment pursuant to 18 U.S.C. § 3161(h)(7)(A). The United States, represented by its attorney, Kerry J. Jacobson, Assistant United States Attorney, consents to this Motion and accompanying Proposed Order.

As represented by the Defendant's signature below, the Defendant, Christopher Charles Baker, states as follows:

1. I am the Defendant in this criminal proceeding, and I am represented by David Weiss.

2. I understand that pursuant to 18 U.S.C. § 3161(b), I have the right to have my case presented to a grand jury within thirty (30) days of my arrest, or, if no grand jury has been in

session during such thirty-day period, the period of time for filing of the indictment shall be extended an additional thirty days.

3. I submit this request to toll grand jury presentment pursuant to 18 U.S.C. § 3161(h)(7)(A) for a period not to exceed 75 days. I make this request because I am negotiating with the United States to resolve this case. The United States is in the process of sending out complete discovery. I need additional time to review all discovery, consider whether any further investigation is needed, and/or negotiate a possible resolution. I further request that an Order be entered providing that this time period shall be tolled and excluded from the speedy indictment time computation pursuant to 18 U.S.C. § 3161(h)(7)(A).

4. I make this request knowingly and voluntarily and after consultation with counsel. If I cannot reach an agreement with the United States Attorney's Office, I understand that my case will be presented to the grand jury at a later date, consistent with this waiver.

DATE:

11-14-2022


CHRISTOPHER CHARLES BAKER
DEFENDANT

David Weiss
DAVID WEISS
ASSISTANT FEDERAL PUBLIC DEFENDER
ATTORNEY FOR DEFENDANT